

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:		
Sheri Lou Cumberledge	Debtor	NO. 17-24288-JAD
Sheri Lou Cumberledge	Movant	CHAPTER 13
vs.		Related to Docs. 88, 90
MidFirst Bank	Respondent	Hearing Date: 5/1/20 @ 11:00 am
		Doc. # 95

**STIPULATION AND ORDER**

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the following Stipulation:

WHEREAS, Debtor has filed an objection to the Respondent's Notice of Mortgage Payment Change dated December 18, 2019, which increased Debtor's monthly payment from \$694.91 to 855.78 effective February 1, 2020;

WHEREAS, the monthly payment increase was due to an increase in the escrow items from \$176.15 to \$179.34 per month, and the addition of an escrow shortage in the amount of \$157.68 per month due to an escrow shortage of \$1,892.17;

WHEREAS, Respondent has agreed to spread out the escrow shortage over 60 months to reduce the monthly payment increase and resolve the pending objection.

It is therefore Stipulated and agreed as follows:

1. The Notice of Mortgage Payment Change filed December 2, 2019 is hereby withdrawn.
2. Debtor's monthly payment will be \$741.90 effective April 1, 2020, as evidenced by the Escrow Account Statement which is attached hereto as Exhibit "A".

3. Included in the monthly payment beginning April 1, 2020 is a Prorated Escrow Shortage payment in the amount of \$43.80, which escrow amount shall be included as part of each payment due through and including the payment due March 1, 2025.
4. Debtor acknowledges that future annual escrow reviews may require increases in the amounts owed for escrow items and escrow shortages, resulting in corresponding increases in monthly payments during the time that the Prorated Escrow Shortage is being paid.
5. The notice requirement of F.R.B.P. 3002.1(b)(1) is waived as to the payment due April 1, 2020.
6. Debtor's Objection to the Notice of Mortgage Payment Change is hereby withdrawn.
7. The hearing scheduled for May 1, 2020 at 11:00 a.m. is cancelled.

Consented to by:

/s/ Scott R. Lowden, Esquire

Scott R. Lowden, Esquire  
Nicotero & Lowden P.C.  
Attorney for Debtor  
3948 Monroeville Blvd., Suite 2  
Phone: 412-374-7161  
Monroeville, PA 15146  
niclowlgl@comcast.net

/s/ James C. Warmbrodt, Esquire

James C. Warmbrodt, Esquire  
KML Law Group, P.C.  
Attorney for Respondent  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Phone: 412-430-3594  
jwarmbrodt@kmlawgroup.com

It is hereby ORDERED that the parties' Stipulation be and hereby is APPROVED.

By the Court,



jsf J.

Jeffery A. Deller  
U.S. Bankruptcy Judge

FILED  
4/17/20 11:47 am  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA

**Certificate of Notice Page 3 of 3**  
 United States Bankruptcy Court  
 Western District of Pennsylvania

In re:  
 Sheri Lou Cumberledge  
 Debtor

Case No. 17-24288-JAD  
 Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0315-2

User: dpas  
 Form ID: pdf900

Page 1 of 1  
 Total Noticed: 1

Date Rcvd: Apr 17, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Apr 19, 2020.

db +Sheri Lou Cumberledge, 17 Orchard Street, P.O. Box 177, Muse, PA 15350-0177

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
 NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Apr 19, 2020

Signature: /s/Joseph Speetjens

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 17, 2020 at the address(es) listed below:

David A. Rice	on behalf of Debtor Sheri Lou Cumberledge	ricelaw1@verizon.net,
lowdenscott@gmail.com		
James Warmbrodt	on behalf of Creditor	Amerihome Mortgage Company, LLC bkgroup@kmlawgroup.com
James Warmbrodt	on behalf of Creditor	MidFirst Bank bkgroup@kmlawgroup.com
James Warmbrodt	on behalf of Creditor	Midland Mortgage as servicer for MIDFIRST BANK
bkgroup@kmlawgroup.com		
James Warmbrodt	on behalf of Creditor	Cenlar FSB as servicer for AmeriHome Mortgage Company,
LLC bkgroup@kmlawgroup.com		
Jerome B. Blank	on behalf of Creditor	Amerihome Mortgage Company, LLC pawb@fedphe.com
Karina Velter	on behalf of Creditor	JPMORGAN CHASE BANK, N.A. amps@manleydeas.com
Office of the United States Trustee		ustpreion03.pi.ecf@usdoj.gov
Ronda J. Winnecour		cmecf@chapter13trusteedpa.com
Scott R. Lowden	on behalf of Debtor Sheri Lou Cumberledge	niclowlgl@comcast.net
Thomas Song	on behalf of Creditor	Amerihome Mortgage Company, LLC pawb@fedphe.com
		TOTAL: 11